Independent Planning Commission NSW
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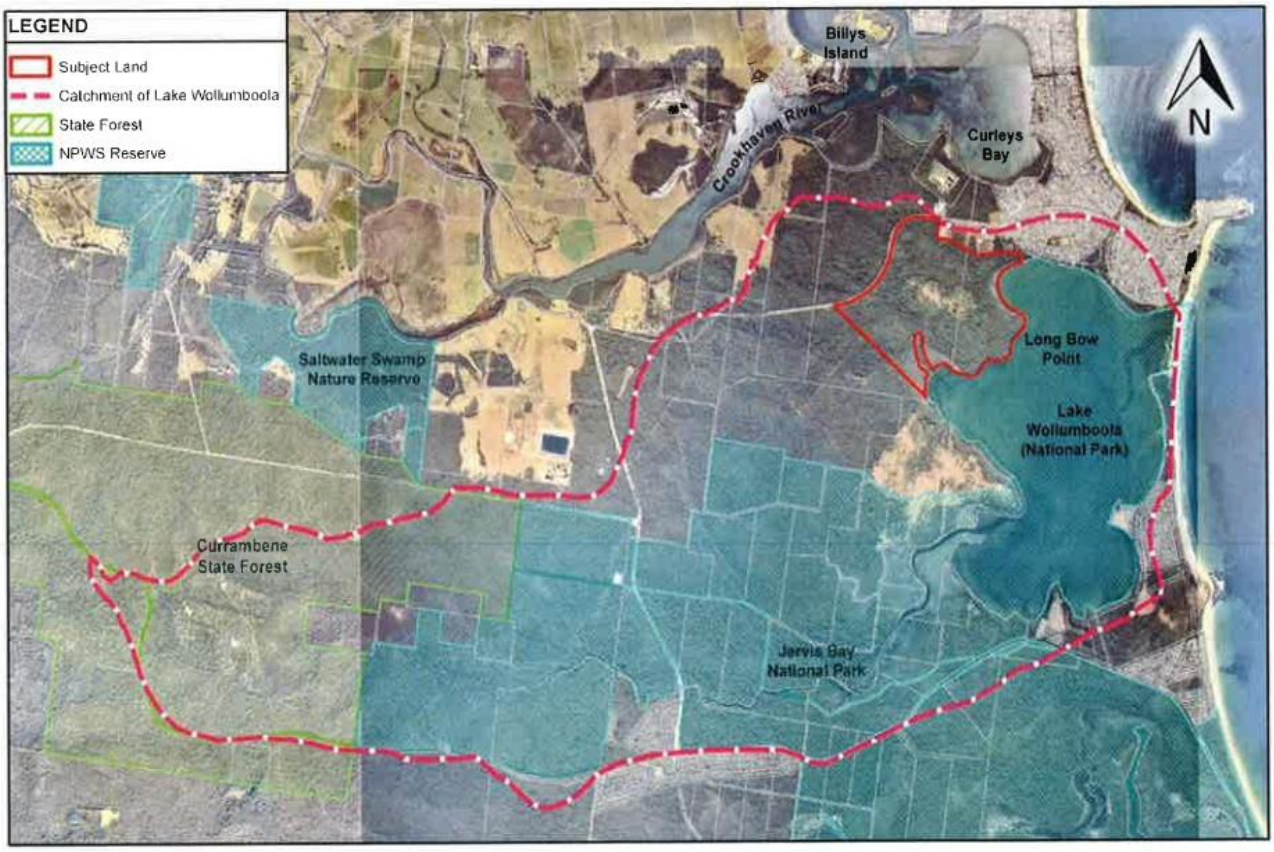
26 July 2018

To Commission members

Objection to West Culburra Concept Proposal (SSD 3846)

It was claimed in the public meeting on 24 July that the existing stormwater from streets adjoining the Lake have had no impact on the Lake – so why would extra urban runoff from the proposed West Culburra development matter? **This is incorrect.**

As shown in the image below the catchment is not pristine. Nutrient levels in the Lake are **already moderate** due to **pollution from the urban stormwater runoff**. The impact of nutrients, pesticides and other pollutants depends on thresholds. No further development should be allowed in the catchment because the pollution levels from urban stormwater are **already too high** and are approaching the **thresholds** when major damage will occur. The other point is that the Lake is a closed receiving waterbody. What goes in there, stays in there. The infrequent openings (once a year or less) do not flush the lake due to ineffective circulation. Nutrients, heavy metals, pesticides and other pollutants are bound up in the plants and animals and in the sediments. The build up of pollutants will eventually affect the lake ecology. Adding extra sources of nutrients will hasten this process and degrade the high and unique values of the lake and its catchment. Lake Wollumbolla and its catchment should be zoned for conservation and protection. Once this has been done, studies and works need to be undertaken in intercept and treat the existing urban stormwater runoff which is polluting the lake and threatens its ecology.



Far from justifying the claims of zero impact, highlighting the streets from which urban stormwater drains into the lake emphasises that the lake is already polluted by this runoff which needs to be treated. Urgent action is required to address this major threat to the ecosystem in the lake. The existing urban runoff **IS ALREADY** polluting the lake. It is the major source of pollution for the Lake. This major threat should be addressed by further studies and redial works to intercept and treat the existing discharges. Various funding sources should be investigated so that these urgent works can be undertaken as soon as possible.

Yours sincerely,

Dr John Anderson (Environmental Scientist with 35 years experience)
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PS I help develop the most recent versions of the **The Australian and New Zealand Guidelines for Fresh and Marine Water Quality** before retiring 4 years ago.